

**U.S. Department of Justice***United States Attorney
Eastern District of New York*

GK/KCB/DEL/SMF
F. #2018R01401

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 24, 2024

By ECF

The Honorable Diane Gujarati
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Cherwitz, et al.
Criminal Docket No. 23-146 (DG)

Dear Judge Gujarati:

The government respectfully requests an adjournment of the Court's forthcoming exhibits deadline of November 8, 2024, to December 6, 2024. The defendants have no objection to the request.

The government requires additional time to prepare its trial exhibits. While diligently working to prepare these exhibits, the government has also been working to comply with the Court's deadlines for motions in limine and responses to the defendants' motions in limine. In addition, the government has begun preparing its 18 U.S.C. § 3500 material, which encompasses not only its proposed witnesses but all individuals interviewed in connection with this multi-year investigation. Furthermore, following the defendants' filings on Monday, October 21, 2024, the government is assessing the defense notices for four separate expert witnesses whom the defendants seek to have testify on a variety of topics at trial. This four-week extension will permit the government to make a fulsome disclosure of its intended trial exhibits, while still ensuring their production more than five weeks before jury selection is scheduled to commence.

In addition, because the defendants' expert notices were filed after the motions deadline in this case, the government respectfully requests to file any motions pertaining to the defense expert notices on or about November 1, 2024 — less than two weeks after defendants' initial notice was filed. The defendants also do not object to this request.

Respectfully submitted,

BREON PEACE
United States Attorney

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